

Guidance for Assigning Hazardous Waste Generator Identification Numbers for Household Hazardous Waste Events

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The hazardous waste transporter, acting as a municipality's contractor to run a household hazardous waste event, should use the existing EPA ID number assigned to the municipal entity conducting the event (e.g., the department of public works, highway department or police department).

Per 310 CMR 30.392(7), *Determining Hazardous Waste Status for Generators that are Sponsors*, the municipal entity, as a generator of hazardous waste who is also a sponsor of an event, is not required to count hazardous waste received during those collection activities toward its hazardous waste generator status.

The collected hazardous waste must be managed independently (i.e., packaged, accumulated, stored, and disposed separately) from the generator's own hazardous waste.

However, if the generator chooses to combine its own hazardous waste with hazardous waste collected at the event(s), then the hazardous waste collected at the event(s) shall be counted toward the generator's status.